

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA,

v.

2:18-cr-00735-MCA-4

PAVANDEEP BAKHSHI,

Defendant.

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**[PROPOSED] CONSENT ORDER  
SUBSTITUTING PROPERTY SECURING APPEARANCE BOND**

This matter having come before the Court on the application of Defendant Pavandeep Bakhshi (“Bakhshi”), through undersigned counsel, for a modification of the December 10, 2018 Order Setting Conditions of Release, as amended by a December 13, 2019 Order in the above-captioned matter (“Conditions of Release”) [Dkt. No. 69], and the December 10, 2018 Appearance Bond, annexed hereto for reference, and the United States having consented;

WHEREAS, Bakhshi has been charged in a three-count indictment alleging conspiracy to commit securities fraud in violation of Title 18, United States Code, Section 371, and securities fraud in violation of Title 15, United States Code, Sections 78j(b) and 78ff, Title 17, Code of Federal Regulations, Section 240.10b-5, and Title 18, United States Code, Section 2; and wire fraud in violation of Title 18, United States Code, Section 1343 and Section 2;

WHEREAS, on December 10, 2018, an Appearance Bond was entered by Bakhshi in the amount of \$1,000,000, which was co-signed by Ms. Fiona Gupta and secured by property located at 10 Forest Crossing, Sagaponak, New York 11963 (“Sagaponak Property”) owned by Mr. Sean Westley and Ms. Sapna Westley (“Property Owners”);

WHEREAS, on December 10, 2018, an Agreement to Forfeit Property for the Sagaponak Property was entered by Bakhshi and the Property Owners;

WHEREAS, Bakhshi and Property Owners seek to substitute the Sagaponak Property securing the Appearance Bond with a property located at 20 Ironwood Drive, Danbury, Connecticut 06811 owned by 20 Ironwood Lane LLC;

WHEREAS, the United States consents to the proposed substitution of the Sagaponak Property securing the Appearance Bond; accordingly;

IT IS on this \_\_\_\_ day of \_\_\_\_\_, 2020, HEREBY ORDERED THAT:

1. The “Release on Bond” provision of the Conditions of Release is modified to substitute the property located at 20 Ironwood Drive, Danbury, Connecticut 06811 in place of the Sagaponak Property currently securing the Appearance Bond.

2. Bakhshi and 20 Ironwood Lane LLC shall execute an agreement to forfeit designated property located at 20 Ironwood Drive, Danbury, Connecticut 06811 and an amended Appearance Bond.

3. Bakhshi shall cause the agreement to forfeit designated property located at 20 Ironwood Drive, Danbury, Connecticut 06811 to be perfected by filing such notice of lien with the Town Clerk of the City of Danbury (with verification of filing provided to U.S. Pretrial Services, District of New Jersey).

4. Upon satisfaction of the above, Bakhshi shall file a separate Order voiding the December 10, 2019 Agreement to Forfeit Property for the Sagaponak Property for execution by the Court.

[signatures on following page]

**Form and entry consented to:**

/s/ Catherine R. Murphy

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HEATHER SUCHORSKY

Assistant U.S. Attorney

CATHERINE R. MURPHY

Assistant U.S. Attorney

LESLIE E. LEHNERT

Trial Attorney,

U.S. Department of Justice,

Money Laundering & Asset Recovery Section

/s/ Franklin G. Monsour

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FRANKLIN G. MONSOUR

Counsel for Defendant Pavandeep Bakhshi

**SO ORDERED:**

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HON. MADELINE COX ARLEO

United States District Judge

Date: August \_\_\_\_, 2020